

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

DAVID WILLIAM WOOD,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC,

Et al.,

Defendants.

Case No. 3:15-cv-594

**PLAINTIFFS' SECOND SUPPLEMENTAL FED. R. CIV. P. 26(a)(1) DISCLOSURES**

COME NOW the Plaintiff, David William Wood, by counsel and pursuant to Fed. R. Civ. P. 26(a)(1), and make the following disclosures to Defendants. These initial disclosures are based on information reasonably available to Plaintiff at this time. Plaintiff reserves the right to supplement these initial disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these initial disclosures, Plaintiff does not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, and this action or any other action. Plaintiff also does not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

**II. Description of documents Plaintiff may use in support of his action:**

Other than those documents obtained from any Defendant in discovery, the Plaintiff has the following documents in his possession and control:

Document Type	<b>Bate Stamp # PLAINTIFFS-</b>
Documents produced by Experian Information Solutions pursuant to subpoena	<b>EXPWOOD SUBP 0000001-0000419</b>
Authentication Affidavit of Mary Methvin, Custodian of Records of Experian Information Solutions	<b>None</b>

All information regarding the investigation of Plaintiff's claim of identity theft.

Respectfully submitted,  
**DAVID WILLIAM WOOD,**

By \_\_\_\_\_ /s/  
Leonard A. Bennett, VSB #37523  
Susan M. Rotkis, VSB#40693  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of June, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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